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9 *Attorney for Defendants William Rogers and*
10 *Harbor Freight Tools USA, Inc.*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 DAN GOULD, an individual, and AUDREE
14 GOULD, an individual,

15 Case No. 2:17-cv-02435-APG-NJK

16 Plaintiffs,

17 vs.

18 WILLIAM ROGERS, an individual,
19 HARBOR FREIGHT TOOLS USA, INC.,
20 a California Corporation, DOES I through
21 X, inclusive, and ROE CORPORATIONS I
22 through X, inclusive,

23 Defendants.

24 **STIPULATION AND ORDER TO
CONTINUE RESPONSE TO
PLAINTIFFS' COMPLAINT AND
MOTION FOR REMAND**

25 **[FIRST REQUEST]**

26 Plaintiffs Dan and Audree Gould, and Defendants William Rogers (“Rogers”) and Harbor
27 Freight Tools USA, Inc. (“Harbor Freight,” together with Rogers, “Defendants”), through their
28 respective counsel, stipulate for the first time to continue Defendant Rogers’ response to
Plaintiffs’ Complaint and Defendants’ response to Plaintiffs’ Motion for Remand, ECF No. 10, as
follows:

29 WHEREAS, Plaintiffs served Defendant Rogers with the Summons and Complaint on
October 6, 2017;

30 WHEREAS, Defendant Rogers’ response to Plaintiffs’ Complaint is due October 27,
2017;

31 WHEREAS, Defendants’ response to Plaintiffs’ Motion for Remand is due October 30,
2017;

32 WHEREAS, this request is timely;

1 WHEREAS, the Parties agreed to provide Defendants' additional time to respond to
2 Plaintiffs' Complaint and Motion for Remand;

3 WHEREAS, this request is not made for purposes of delay and is supported by good
4 cause;

5 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
6 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

7 1. Defendant Rogers will respond to Plaintiffs' Complaint on or before November
8 10, 2017.

9 2. Defendants will respond to Plaintiffs' Motion for Remand on or before November
10 13, 2017.

11 **IT IS SO STIPULATED.**

13 DATED: October 25, 2017.

14 JENNINGS & FULTON, LTD.

16 By: /s/ Adam R. Fulton

17 JARED B. JENNINGS, ESQ.
ADAM R. FULTON, ESQ.
TOD R. DUBOW, ESQ.
2580 Sorrel Street
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19 *Attorneys for Plaintiffs*

13 DATED: October 25, 2017.

14 SNELL & WILMER L.L.P.

16 By:/s/ Karl O. Riley

17 Karl O. Riley, Esq.
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3883 Howard Hughes Parkway, Suite 1100
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19 *Attorney for Defendants William Rogers
and Harbor Freight Tools USA, Inc.*

21 **ORDER**

22 IT IS ORDERED THAT Defendant Rogers shall respond to Plaintiffs' Complaint on or
23 before November 10, 2017.

24 IT IS FURTHER ORDERED THAT Defendants shall respond to Plaintiffs' Motion for
25 Remand on or before November 13, 2017.

26 **IT IS SO ORDERED.**

27 
UNITED STATES DISTRICT JUDGE
Dated: October 25, 2017.